

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION**

IN RE:

**CAH ACQUISITION COMPANY #1, LLC,
d/b/a WASHINGTON COUNTY HOSPITAL,**

CASE NO. 19-00730-5-JNC

Debtor,

CHAPTER 11

**THOMAS W. WALDREP, JR., as
LITIGATION TRUSTEE**

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)
)
)

Plaintiff,

)
)
)

**ADVERSARY PROCEEDING
NO. 22-00101-5-JNC**

v.

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)

**REBOOT, INC., d/b/a HIPAA GUARD,
RURAL LAB OUTREACH, LLC, and
MICHAEL REECE,**

)
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)
)

Defendants.

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IN RE:

**CAH ACQUISITION COMPANY #2, LLC,
d/b/a OSWEGO COMMUNITY HOSPITAL,**

CASE NO. 19-01230-5-JNC

Debtor,

CHAPTER 11

**THOMAS W. WALDREP, JR., as
LITIGATION TRUSTEE**

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Plaintiff,

)
)

**ADVERSARY PROCEEDING
NO. 22-00102-5-JNC**

v.

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)

**REBOOT, INC., d/b/a HIPAA GUARD,
RURAL LAB OUTREACH, LLC, and
MICHAEL REECE,**

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)
)

Defendants.

)
)

IN RE:

**CAH ACQUISITION COMPANY #3, LLC,
d/b/a HORTON COMMUNITY HOSPITAL,**

Debtor,

THOMAS W. WALDREP, JR., as)
LITIGATION TRUSTEE)
Plaintiff,)
v.)
REBOOT, INC., d/b/a HIPAA GUARD,)
RURAL LAB OUTREACH, LLC, and)
MICHAEL REECE,)
Defendants.)

CASE NO. 19-01180-5-JNC

CHAPTER 11

**ADVERSARY PROCEEDING
NO. 22-00103-5-JNC**

IN RE:

**CAH ACQUISITION COMPANY 6, LLC,
d/b/a I-70 COMMUNITY HOSPITAL,**

Debtor,

THOMAS W. WALDREP, JR., as)
CHAPTER 7 TRUSTEE)
Plaintiff,)
v.)
REBOOT, INC., d/b/a HIPAA GUARD,)
RURAL LAB OUTREACH, LLC, and)
MICHAEL REECE,)
Defendants.)

CASE NO. 19-01300-5-JNC

CHAPTER 7

**ADVERSARY PROCEEDING
NO. 22-00104-5-JNC**

IN RE:

**CAH ACQUISITION COMPANY 7, LLC,
d/b/a PRAGUE COMMUNITY HOSPITAL,**

Debtor,

CASE NO. 19-01298-5-JNC

CHAPTER 11

THOMAS W. WALDREP, JR., as)
LITIGATION TRUSTEE)
Plaintiff,)
v.)
REBOOT, INC., d/b/a HIPAA GUARD,)
RURAL LAB OUTREACH, LLC, and)
MICHAEL REECE,)
Defendants.)

**ADVERSARY PROCEEDING
NO. 22-00105-5-JNC**

IN RE:

**CAH ACQUISITION COMPANY 12, LLC,
d/b/a FAIRFAX COMMUNITY HOSPITAL,**

Debtor,

CASE NO. 19-01697-5-JNC

CHAPTER 11

THOMAS W. WALDREP, JR., as)
LITIGATION TRUSTEE)
Plaintiff,)
v.)
REBOOT, INC., d/b/a HIPAA GUARD,)
RURAL LAB OUTREACH, LLC, and)
MICHAEL REECE,)
Defendants.)

**ADVERSARY PROCEEDING
NO. 22-00106-5-JNC**

IN RE:

**CAH ACQUISITION COMPANY 16, LLC,
d/b/a HASKELL COUNTY COMMUNITY
HOSPITAL,**

CASE NO. 19-01227-5-JNC

Debtor,

CHAPTER 11

THOMAS W. WALDREP, JR., as LIQUIDATING TRUSTEE)	
)	
Plaintiff,)	ADVERSARY PROCEEDING
)	NO. 22-00107-5-JNC
)	
REBOOT, INC., d/b/a HIPAA GUARD, RURAL LAB OUTREACH, LLC, and MICHAEL REECE,)	
)	
Defendants.)	
)	

**DEFENDANTS' MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO PLAINTIFF'S SECOND SET OF DISCOVERY**

NOW COMES Defendants, Reboot, Inc. D/B/A HIPAA Guard, Rural Lab Outreach, LLC and Michael Reece, by and through its undersigned counsel, and presents to the Court its motion pursuant to Rule 9006 of the Federal Rules of Bankruptcy Procedure for an enlargement of time of thirty (30) days until October 6, 2023 to respond to Plaintiff's Second Set of Admissions, Interrogatories and Requests for Production of Documents (the "Discovery Requests"). In support of this motion, Defendants state the following:

1. Plaintiff served the Discovery Requests on Defendants on August 7, 2023.
2. Defendants' time to respond to the requests has not expired, and they require additional time to adequately investigate and prepare their responses.

3. Also, since Defendants' receipt of the Discovery Requests, Defendants have replaced its lead counsel with the undersigned counsel as its lead counsel and counsel needs additional time to prepare the appropriate responses.

4. Furthermore, the Plaintiff recently filed its Third Motion to Amend Pretrial Scheduling Order (the "Third Motion") to have the deadlines in these actions track the scheduling order and deadlines in the "Management APs." Under the Third Motion, the discovery deadline would be extended to December 21, 2023. Therefore, Plaintiff will not be prejudiced by the extension of the deadline to respond to the Discovery Requests.

5. Counsel for Defendants has consulted with the counsel for Plaintiff, and counsel for Plaintiff does not object to this requested extension of time.

6. A copy of the proposed Order granting the Motion is attached hereto as Exhibit A.

WHEREFORE, Defendants respectfully request the Court grant an extension of time of thirty (30) days, up to and including October 6, 2023, to respond to Plaintiff's Second Set of Admissions, Interrogatories and Requests for Production of Documents and to grant such other and further relief as the Courts deems just and proper.

Respectfully submitted this 31st day of August, 2023.

WOMBLE BOND DICKINSON (US) LLP

/s/ James S. Livermon III
James S. Livermon III
NC State Bar No. 26492
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Jesse A. Schaefer
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Counsel for Defendants

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION

IN RE:

**CAH ACQUISITION COMPANY #1, LLC,
d/b/a WASHINGTON COUNTY HOSPITAL,**

CASE NO. 19-00730-5-JNC

Debtor,

CHAPTER 11

**THOMAS W. WALDREP, JR., as
LITIGATION TRUSTEE**

**ADVERSARY PROCEEDING
NO. 22-00101-5-JNC**

Plaintiff,

)
vi.)

**REBOOT, INC., d/b/a HIPAA GUARD,
RURAL LAB OUTREACH, LLC, and
MICHAEL REECE,**

**ADVERSARY PROCEEDING
NO. 22-00101-5-JNC**

Defendants.

CASE NO. 19-01230-5-JNC

IN RE:

**CAH ACQUISITION COMPANY #2, LLC,
d/b/a OSWEGO COMMUNITY HOSPITAL,**

CHAPTER 11

Debtor,

THOMAS W. WALDREP, JR., as)
LITIGATION TRUSTEE)
Plaintiff,)
v.)
REBOOT, INC., d/b/a HIPAA GUARD,)
RURAL LAB OUTREACH, LLC, and)
MICHAEL REECE,)
Defendants.)
)

IN RE:

**CAH ACQUISITION COMPANY #3, LLC,
d/b/a HORTON COMMUNITY HOSPITAL,**

Debtor,

**ADVERSARY PROCEEDING
NO. 22-00102-5-JNC**

THOMAS W. WALDREP, JR., as)
LITIGATION TRUSTEE)

Plaintiff,)

vi.)

REBOOT, INC., d/b/a HIPAA GUARD,)
RURAL LAB OUTREACH, LLC, and)
MICHAEL REECE,)

Defendants.)

CASE NO. 19-01180-5-JNC

CHAPTER 11

**ADVERSARY PROCEEDING
NO. 22-00103-5-JNC**

IN RE:

**CAH ACQUISITION COMPANY 6, LLC,
d/b/a I-70 COMMUNITY HOSPITAL,**

Debtor,

CASE NO. 19-01300-5-JNC

CHAPTER 7

THOMAS W. WALDREP, JR., as)
CHAPTER 7 TRUSTEE)
Plaintiff,)
vi.)
REBOOT, INC., d/b/a HIPAA GUARD,)
RURAL LAB OUTREACH, LLC, and)
MICHAEL REECE,)
Defendants.)
)

IN RE:

**CAH ACQUISITION COMPANY 7, LLC,
d/b/a PRAGUE COMMUNITY HOSPITAL,**

Debtor,

**ADVERSARY PROCEEDING
NO. 22-00104-5-JNC**

THOMAS W. WALDREP, JR., as)
LITIGATION TRUSTEE)
Plaintiff,)

CASE NO. 19-01298-5-JNC

CHAPTER 11

vi.)
REBOOT, INC., d/b/a HIPAA GUARD,)
RURAL LAB OUTREACH, LLC, and)
MICHAEL REECE,)
Defendants.)
)

**ADVERSARY PROCEEDING
NO. 22-00105-5-JNC**

IN RE:

**CAH ACQUISITION COMPANY 12, LLC,
d/b/a FAIRFAX COMMUNITY HOSPITAL,**

Debtor,

CASE NO. 19-01697-5-JNC

CHAPTER 11

THOMAS W. WALDREP, JR., as LITIGATION TRUSTEE)	
)	
Plaintiff,)	ADVERSARY PROCEEDING
)	NO. 22-00106-5-JNC
vi.)	
)	
REBOOT, INC., d/b/a HIPAA GUARD, RURAL LAB OUTREACH, LLC, and MICHAEL REECE,)	
)	
Defendants.)	
)	

IN RE:

**CAH ACQUISITION COMPANY 16, LLC,
d/b/a HASKELL COUNTY COMMUNITY
HOSPITAL,**

Debtor,

CASE NO. 19-01227-5-JNC

CHAPTER 11

THOMAS W. WALDREP, JR., as LIQUIDATING TRUSTEE)	
)	
Plaintiff,)	ADVERSARY PROCEEDING
)	NO. 22-00107-5-JNC
vi.)	
)	
REBOOT, INC., d/b/a HIPAA GUARD, RURAL LAB OUTREACH, LLC, and MICHAEL REECE,)	
)	
Defendants.)	
)	

ORDER GRANTING DEFENDANTS' MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO PLAINTIFF'S SECOND SET OF DISCOVERY

This matter comes before the Court upon the Motion for Enlargement of Time to Respond to Plaintiff's Second Set of Discovery (the "Motion") filed on behalf of Defendants Reboot, Inc., D/B/A HIPAA Guard, Rural Lab Outreach, LLC, and Michael Reece ("Defendants"). For the reasons stated in the Motion, it is:

ORDERED, AJUDGED AND DECREED that the Motion is hereby granted and Defendants shall have up to and including October 6, 2023 to respond to Plaintiff's Discovery Requests.

END OF DOCUMENT

CERTIFICATE OF SERVICE

I, the undersigned, or Womble Bond Dickinson (US) LLP certifies:

That I am, at all times hereinafter mentioned was, more than eighteen (18) years of age;

That on this day, the foregoing Defendants' Motion for Enlargement of Time to Respond to Plaintiff's Second Set of Discovery was served by electronic means through the court's CM/ECF service on:

Micah E. Marcus, Esq.
John Van Swearingen, Esq.
Attorneys for Plaintiff

I certify under penalty of perjury that the foregoing is true and correct.

Dated: August 31, 2023

WOMBLE BOND DICKINSON (US) LLP

By: /s/ James S. Livermon, III
James S. Livermon, III

Counsel for Defendants